

INTEROFFICE MEMORANDUM

TO: Distribution

FROM: Office of Chief Information Officer (OCIO)

DATE: **JUN 26 2001**

SUBJECT: Defense Information Systems Agency Section 508  
Implementation

Preparer: B. McCain/CIO/703-696-4332

1. In 1998, Congress amended the Rehabilitation Act and strengthened provisions covering access to information in the Federal sector. As amended, Section 508 of the Rehabilitation Act requires access to the Federal government's electronic and information technology (EIT). The law covers all types of EIT in the Federal sector and is not limited to assistive technologies used by people with disabilities. The Architectural and Transportation Barriers Compliance Board (ATBCB), known as "the Access Board," is an independent Federal agency devoted to accessibility for people with disabilities. The Access Board is responsible for developing accessibility standards for such EIT to incorporate into regulations that govern Federal procurement practices. The Access Board published the final standards on 21 December 2000. The enforcement date of the Section 508 standards was 21 June 2001. The Office of Chief Information Officer (OCIO) established and led a DISA IT Accessibility Team (ITAT) to develop and implement an overall strategic approach to Section 508 implementation.

2. The Federal Acquisition Regulatory (FAR) Council was required to revise the FAR to incorporate the Access Board's standards. The FAR Final Rule was published in the Federal Register on 25 April 2001. Beginning 25 June 2001, Federal agencies are required to purchase EIT that meets Section 508 accessibility standards except where it would pose an undue burden or any other exceptions mentioned below.

3. DISA's Acquisition, Logistics, and Facilities Organization (D4) is finalizing the Agency's Section 508 Interim Acquisition Policy Guidance to ensure the successful implementation of Section 508 by the acquisition community. The acquisition of EIT must meet the required performance criteria and technical standards provided by the Access Board. This guidance may impact the administrative processes on existing programs and projects. D4's Interim Acquisition Policy Guidance addresses the following Section 508 exceptions: 1) micro-purchases; 2) contractor procured EIT incidental to the contract; 3) areas frequented only by service personnel; 4) undue burden on the Agency; and 5) EIT for National Security Systems (NSS);

4. The Defense Information Systems Agency (DISA) and the National Communications System (NCS) core mission area programs/systems are granted the NSS exception when "telecommunications or information systems operated by agencies, the function, operation, or use of which involves intelligence activities, cryptologic activities related to national security, command and control of military forces, equipment that is an integral part of a weapon or weapons system, or systems which are critical to the direct fulfillment of military or intelligence missions." This exception is statutory under Section 508 and is consistent with a similar exception in Section 5142 of the Clinger Cohen Act of 1996 (40 U.S.C. 1452). Section 508 does apply when "a system that is to be used for routine administrative and business applications (including payroll, finance, logistics, and personnel management applications.)" For example, software used for payroll, word processing software used for production of routine documents, ordinary telephones, copiers, fax machines, and web based applications must still comply with the standards even if they are developed, procured, maintained, or used by DISA/NCS when engaged in intelligence or military activities. Until otherwise notified, Chief Information Officer (CIO), Information Technology (IT) Staff will review and approve NSS exceptions based on D4's checklist entitled "Section 508 Determination for Purchase Requests," and in Acquisition Plans, as appropriate.

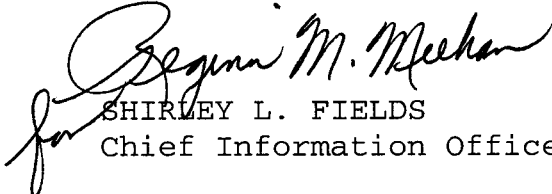
5. To be granted an "undue burden" exception, the requiring office must complete the D4's "EIT Undue Burden

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Exception Determination and Certification" form. This form and the "Section 508 Determination for Purchase Requests" are included in the Section 508 Interim Acquisition Policy Guidance.

6. The law also provides a complaint process under which complaints concerning access to technology will be investigated by the responsible Federal agency. Forthcoming is the Equal Employment Opportunity (EEO) Policy Guidance for Section 504 (accommodations for the disabled) and 508 (EIT accessibility for the disabled) of the Rehabilitation Act, establishing procedures for providing reasonable accommodation for individuals with disabilities. This policy will be in full compliance with the reasonable accommodation requirements of the Rehabilitation Act of 1973.

7. Questions should be directed to the OCIO, IT Staff, Section 508 Coordinator, Mr. Ed Norwood, (703) 696-2779.

  
SHIRLEY L. FIELDS  
Chief Information Officer

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